

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NORTH DAKOTA**

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In re:

**Jointly Administered**

EPIC Companies Midwest, LLC,  
EPIC Companies Midwest 2023, LLC,  
EPIC Employee, LLC,  
EOLA Capital, LLC, and  
EC West Fargo, LLC,

Bankruptcy No. 24-30281  
Bankruptcy No. 24-30282  
Bankruptcy No. 24-30283  
Bankruptcy No. 24-30284  
Bankruptcy No. 24-30285

Debtors.<sup>1</sup>

Chapter 11

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**THIRD APPLICATION OF FREMSTAD LAW FIRM FOR THE ALLOWANCE OF  
FEES AND EXPENSES AS SPECIAL LITIGATION COUNSEL FOR THE DEBTORS  
FROM JUNE 1, 2025, THROUGH JUNE 30, 2025**

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1. Mark Western and Fremstad Law Office (collectively, “Fremstad”) make this Application for allowance of fees for professional services rendered and for reimbursement of expenses incurred as special litigation counsel for EPIC Companies Midwest, LLC, EPIC Companies Midwest 2023, LLC, EPIC Employee, LLC, EOLA Capital, LLC, and EC West Fargo, LLC (collectively, the “Debtors”) between June 1, 2025 and June 30, 2025 pursuant to 11 U.S.C. § 330.

2. In support of this Application, Fremstad respectfully states as follows:

**JURISDICTION**

3. This Court has jurisdiction over this Application pursuant to 28 U.S.C. §§ 157 and 1334 and Fed. R. Bankr. P. 5005. This a core proceeding pursuant to 28 U.S.C. § 157(b). Venue

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<sup>1</sup> In accordance with Fed. R. Bankr. P. 2002(n) and 1005 and 11 U.S.C. § 342(c), as applicable, the Debtors’ address is 400 10th Street SE, Minot, ND 58701 and their Employer Identification Numbers (EINs) are as follows: 83-2840705 (EPIC Companies Midwest, LLC), 88-3709518 (EPIC Companies Midwest 2023, LLC), 88-4112082 (EPIC Employee, LLC), 88-0554720 (EOLA Capital, LLC) and 82-5331354 (EC West Fargo, LLC).

is proper before this Court pursuant to 28 U.S.C. §§ 1408 and 1409. The petitions commencing these Chapter 11 cases were filed on July 8, 2024 (the “Petition Date”). The cases are currently pending before this Court.

4. 8 U.S.C. §§ 157 and 1334 and Fed. R. Bankr. P. 5005. This a core proceeding pursuant to 28 U.S.C. § 157(b). Venue is proper before this Court pursuant to 28 U.S.C. §§ 1408 and 1409. The petitions commencing these Chapter 11 cases were filed on July 8, 2024 (the “Petition Date”). The cases are currently pending before this Court.

5. This Application arises under 11 U.S.C. §§ 503(b)(2), 328(a), 330, and 331. This Application is filed under Fed. R. Bankr. P. 2016 and 2002(a)(6). Notice of this Application is provided pursuant to the Notice and Service Requirements adopted pursuant to Local Rule 2002-1 and the Court’s order limiting notice pursuant to Fed. R. Bankr. P. 2002(i). (ECF No. 124.)

### **BACKGROUND**

6. On February 3, 2025, the Debtors filed an application to employ Fremstad as special litigation counsel for the Debtors effective February 3, 2025. (ECF No. 218.) The Court approved the application to employ Fremstad on February 20, 2025. (ECF No. 233.) A copy of that order is attached as **Exhibit A**.

7. On the Petition Date, the Debtors filed a motion for an order establishing interim compensation procedures. (ECF No. 11.) The Court entered an order on August 14, 2024, granting the motion and allowing professionals, including Fremstad, to file applications for compensation. (ECF No. 72.) A copy of that order is attached as **Exhibit B**.

8. This is Fremstad’s second application for allowance of fees and expenses under 11 U.S.C. § 331.

9. Fremstad believes that the Debtors are current in payment of ordinary operating expenses and any allowed administrative expenses, that any quarterly fees have been or will be paid as required to the United States Trustee, and that all monthly operating reports are being timely filed, including pursuant to any extensions granted by the United States Trustee.

**RELIEF REQUESTED**

10. By this Application, Fremstad requests allowance of fees for professional services rendered during these Chapter 11 cases between June 1, 2025, and June 30, 2025, in the amount of **\$8,593.50**, and reimbursement of expenses in the amount of **\$0**, for a total of **\$8,593.50**.

11. The professional services rendered by Fremstad are detailed on the attached **Exhibit C**. Those services include the tasks specifically described below:

**Adversary Proceeding Against Sheyenne 32 North, LLC et al.: \$4,296.75**

Services include drafting, reviewing, finalizing, serving and filing pleadings; analyzing issues and monitoring status; reviewing applicable law/rules; communication with other counsel and client representatives.

<u>Name</u>	<u>Hours</u>	<u>Year</u>	<u>Hourly Rate</u>	<u>Fees</u>
Mark Western	7.85	2025	\$375.00	\$2943.75
Terri Bourcy Smith	8.2	2025	\$165.00	1353.00
<b>TOTAL</b>	<b>8.45</b>			<b>\$4,296.75</b>

Blended Hourly Rate:	\$270.00
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**Adversary Proceeding Against EPIC Gateway, LLC et al.: \$4,296.75**

Services include drafting, reviewing, finalizing, serving and filing pleadings; analyzing issues and monitoring status; reviewing applicable law/rules; communication with other counsel and client representatives.

<u>Name</u>	<u>Hours</u>	<u>Year</u>	<u>Hourly Rate</u>	<u>Fees</u>
Mark Western	7.85	2025	\$375.00	\$2943.75
Terri Bourcy Smith	8.2	2025	\$165.00	1353.00
<b>TOTAL</b>	<b>8.45</b>			<b>\$4,296.75</b>

Blended Hourly Rate:	\$270.00
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**TOTAL POST-PETITION FEES: \$8,593.50**

12. **Reimbursement of Expenses.** In the course of this representation, Fremstad has also incurred expenses detailed on **Exhibit C**, and requests allowance thereof as follows:

<b><u>Expenses</u></b>	<b><u>Amount</u></b>
NONE	\$0
<b>TOTAL</b>	<b>\$0.00</b>

**TOTAL EXPENSES: \$0.00**

13. All services and expenses have been equally applicable to and therefore pro rated to each adversary matter (one-half to Sheyenne 32 North, LLC and one-half to Epic Gateway, LLC).

14. All services for which fees are requested by Fremstad were performed for and on behalf of the Debtors, and not on behalf of any committee, creditor, or other person.

15. The amount requested constitutes reasonable compensation for actual, necessary services rendered by Fremstad, based on the nature, the extent, and the value of such services, the time spent on such services, and the cost of comparable services other than in a case under Title 11. Fremstad has not entered into any agreement, express or implied, with any other party-in-interest, including the Debtors, any creditor, receiver, trustee, or any representative of any of them, or with any attorney for such party-in-interest in the proceedings, for the purpose of fixing fees or other compensation to be paid to such party-in-interest in the proceedings for services rendered or expenses incurred from the assets of the estate in excess of the compensation allowed by law.

**WHEREFORE**, Fremstad respectfully requests that the Court enter an order:

A. Allowing Fremstad's fees incurred between June 1, 2025, and June 30, 2025, in the amount of **\$8,593.50**, and expenses in the amount of **\$0**, totaling **\$8,593.50**;

- B. Authorizing the Debtors to pay Fremstad such allowed postpetition fees and expenses;
- C. Granting administrative expense priority to Fremstad's allowed fees and expenses; and
- D. Granting such other and further relief as June be just and proper.

Dated: July 16, 2025

/s/ Mark Western

Joel M. Fremstad (ND ID #05541)

Mark Western (ND ID# 06181)

FREMSTAD LAW FIRM

P.O. Box 3143

Fargo, North Dakota 58108-3143

Phone: (701) 478-7620

joel@fremstadlaw.com

mark@fremstadlaw.com

**ATTORNEYS FOR DEBTORS**

**AFFIDAVIT**

I, Mark Western an attorney at Fremstad Law Firm, declare under penalty of perjury that the foregoing First Application of Fremstad Law Firm for Allowance of Fees and Expenses as Special Litigation Counsel for the Debtors for June 2025 is true and correct according to the best of my knowledge, information, and belief.

Dated: July 16, 2025

/s/ Mark Western

Mark Western

**EXHIBIT A**

**\*\*\*NOTE TO PUBLIC ACCESS USERS\*\*\*** Judicial Conference of the United States policy permits attorneys of record and parties in a case (including pro se litigants) to receive one free electronic copy of all documents filed electronically, if receipt is required by law or directed by the filer. PACER access fees apply to all other users. To avoid later charges, download a copy of each document during this first viewing. However, if the referenced document is a transcript, the free copy and 30-page limit do not apply.

**U.S. Bankruptcy Court  
District of North Dakota**

Notice of Electronic Filing

The following transaction was received from vck entered on 2/20/2025 at 3:21 PM CST and filed on 2/20/2025

**Case Name:** EPIC Companies Midwest, LLC

**Case Number:** 24-30281

**Document Number:** 233

**Docket Text:**

Order Approving Application to Employ Joel M. Fremstad, Mark Western and Fremstad Law Firm as special litigation counsel for the Debtors (Related Doc # [218]). The application to employ is APPROVED subject to the limitations on compensation provided by 11 U.S.C. § 328. This order is not a determination that the services or rates charged are necessary and reasonable. The person or entity employed under this order shall file a fee application in accordance with the Bankruptcy Code and Federal Rules of Bankruptcy Procedures. See Fed. R. Bank. P. 2016, 2017 and 11 U.S.C. §§ 329, 330. Applicant must also comply with Local Rules. Applicant is also granted authority to apply for fees and expenses pursuant to #[72] Order Establishing Procedures for Interim Compensation and Reimbursement for Expenses for Retained Professionals. As required by applicable federal rule or statute, the Movant shall serve this docket text only order on all appropriate parties that will not receive notice of electronic filing. By Judge Shon Hastings. (Text order only). Signed on 2/20/2025 (vck)

**EXHIBIT B**



**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NORTH DAKOTA**

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In re:

**Jointly Administered**

EPIC Companies Midwest, LLC,  
EPIC Companies Midwest 2023, LLC,  
EPIC Employee, LLC,  
EOLA Capital, LLC, and  
EC West Fargo, LLC,

Bankruptcy No. 24-30281  
Bankruptcy No. 24-30282  
Bankruptcy No. 24-30283  
Bankruptcy No. 24-30284  
Bankruptcy No. 24-30285

Debtors.

Chapter 11

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**ORDER ESTABLISHING PROCEDURES FOR INTERIM COMPENSATION AND  
REIMBURSEMENT OF EXPENSES FOR RETAINED PROFESSIONALS**

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Debtors filed a Motion for an Order (I) Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Retained Professionals and (II) Granting Related Relief. Doc. 11. Pursuant to the notice of the Motion [Doc. 16], objections to the Motion were due by July 30, 2024.

Debtors served notice of the Motion. The Court received no objections to the Motion. The Court held a hearing on the Motion on August 14, 2024. Based upon the Motion and the Declaration of Patrick Finn [Doc. 6] and for the reasons stated on the record at the August 14, 2024, hearing, the Court finds that the circumstances of these cases warrant granting the relief provided below.

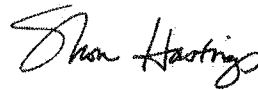
**IT IS ORDERED** that, except as otherwise provided in any order of the Court, professionals employed in this bankruptcy case, including Fredrikson & Byron, P.A., shall be permitted to seek interim payment of compensation and reimbursement of expenses by filing monthly applications for interim compensation and reimbursement of expenses.

**IT IS FURTHER ORDERED** that Debtors are authorized to pay all reasonable amounts invoiced by Lighthouse Management Group, Inc. (“Lighthouse”) for fees and expenses on a bi-weekly basis.

**IT IS FURTHER ORDERED** that Lighthouse will file with the Court and serve on Debtors, the United States Trustee, and any statutory committee appointed in this case (the “Notice Parties”) a monthly staffing report, filed and served by the 20th of each month for the previous month, identifying the Lighthouse employees who worked on this case, the total hours billed by Lighthouse, and a summary of the tasks performed. Lighthouse will also file with the Court and serve on the Notice Parties a quarterly compensation report by the 20th of each month following the end of a quarter, showing the total fees and expenses for the preceding quarter. These reports will be deemed applications for interim compensation under sections 328 and 330. Parties in interest may object to the reports within 21 days after notice. The Court will rule on the applications after the deadline to object passes or after a hearing on the application.

**IT IS FURTHER ORDERED** that Debtors will allocate the fees and expenses approved among Debtors pro rata if the professionals charge for tasks that generally apply to all cases and to the appropriate Debtor if the tasks relate solely to a specific Debtor.

Dated: August 14, 2024.



SHON HASTINGS, JUDGE  
UNITED STATES BANKRUPTCY COURT

**EXHIBIT C**



## INVOICE

Invoice # 17904  
Date: 07/07/2025  
Due Upon Receipt

### Fremstad Law

PO Box 3143  
Fargo, ND 58108

EPIC Gateway & Sheyenne Adversary Actions

### Bankruptcy

Date	Attorney	Notes	Quantity	Rate	Total
05/01/2025	TBS	Receive, download and review docket text orders;	0.10	\$165.00	\$16.50
05/01/2025	MW	Review of multiple Court ECF Orders regarding payment of expenses;	0.10	\$375.00	\$37.50
05/02/2025	MW	Review ECF pleadings; Review email correspondence from attorney Nixon regarding discovery issues; Cursory review of same;	0.30	\$375.00	\$112.50
05/05/2025	TBS	Review email from Fredrikson firm re fee approval; Receive, download and review order approving settlement re Northern Mall; Receive, download and review application to employ creative planning;	0.20	\$165.00	\$33.00
05/05/2025	MW	Review ecf pleading regarding Plan of Reorganization and cursory review of same to determine whether there is any effect upon pending Adversary Proceedings;	0.20	\$375.00	\$75.00
05/06/2025	TBS	Receive, download and review Chapter 11 Plan of Reorganization and Disclosure Statement by Epic; Receive, download and review notice of hearing on disclosure statement, update calendar;	0.20	\$165.00	\$33.00
05/08/2025	MW	Emails from and to opposing counsel regarding discovery plan meeting;	0.10	\$375.00	\$37.50
05/08/2025	MW	Review multiple ECF pleadings filed regarding transferring of claims;	0.10	\$375.00	\$37.50
05/09/2025	TBS	Receive, download and review claim transfers: 7 Mile Holding to Hain Capital, Antonucci to Hain Capital, Postemski to Hain Capital, Breyer to Hain Capital, Gehrtz to Hain Capital, Geron to Hain Capital, Myhre to Hain Capital, Second Chance to Hain Capital, Merrill to Hain Capital, Flaten	0.50	\$165.00	\$82.50

		Holdings to Hain Capital, Dietz Properties to Hain Capital, Dietz dba Dietz Proper to Hain Capital, and notice of motion and motion to approve settlement with The Don;			
05/09/2025	MW	Prepare for and attend TEAMS conference with all opposing counsel; Email correspondence/ report to Patrick Finn regarding same;	0.50	\$375.00	\$187.50
05/12/2025	TBS	Receive, download and review multiple BNC certificates re claim transfers; review multiple clerk's notices re transfers; conference with Mark Western and prepare draft second fee application and proposed exhibits; revise and finalize second fee application, notice and exhibits, electronically submit second application;	1.30	\$165.00	\$214.50
05/12/2025	MW	Review multiple ECF pleadings of assignment of claims; Email from and to Patrick Finn for discovery conference call;	0.10	\$375.00	\$37.50
05/12/2025	MW	Review and revise draft fee application pleadings; Instruct paralegal to file same;	0.20	\$375.00	\$75.00
05/13/2025	TBS	Receive, download and review recent court filings;	0.10	\$165.00	\$16.50
05/14/2025	MW	Prepare for and attend TEAMS conference with Katherine Nixon and Patrick Finn regarding discovery issues;	0.80	\$375.00	\$300.00
05/14/2025	TBS	Review and download recent pleadings; review Epic ediscovery via CSDisco data link;	0.70	\$165.00	\$115.50
05/14/2025	MW	Sign up to DISCO and preliminary review of documents in DISCO discovery document file;	1.10	\$375.00	\$412.50
05/15/2025	TBS	Receive, download and review Application for Compensation Monthly Staffing Report for Lighthouse Management Group, Inc. ;	0.10	\$165.00	\$16.50
05/15/2025	MW	Review ECF filing regarding Lighthouse Application for Compensation;	0.10	\$375.00	\$37.50
05/20/2025	MW	Review transfer of claim ECF pleading;	0.10	\$375.00	\$37.50
05/20/2025	TBS	Receive, download and review multiple monthly operating reports and exhibits, transfer of claim from Campbell to Bradford Holding and transfer of claim from Drovda to Bradford Holding	0.30	\$165.00	\$49.50
05/20/2025	MW	Review Operating Report ECF filings;	0.10	\$375.00	\$37.50
05/21/2025	MW	Review ECF Order for Oral argument;	0.10	\$375.00	\$37.50
05/21/2025	TBS	Receive, download and review order for oral argument re right to jury trial and update calendar;	0.30	\$165.00	\$49.50

05/27/2025	TBS	Receive, download and review notice of transfer of claims-Vicki Campbell to Bradford Capital Holdings, David Drovdal to BCH, Walkers to BCH and Order Approving Application to Employ Accountants Jason Primus, CPA;	0.40	\$165.00	\$66.00
05/27/2025	MW	Review ECF Notice of Claim; Email correspondence to all counsel consenting to attorney Singer appearing personally at hearing for jury trial issues; Review of discovery requests propounded by Defendants;	0.30	\$375.00	\$112.50
05/28/2025	MW	Email correspondence to client regarding discovery requests; Multiple emails between counsel for parties as to personal attendance at Hearing next week and communication with Chambers regarding same;	0.20	\$375.00	\$75.00
05/28/2025	TBS	Receive, download and review notice of transfer of claim Arco-Westbrand; Receive, download and review discovery requests in both underlying action, calendar response deadlines; review emails re appearance vs zoom for jury trial oral argument;	0.50	\$165.00	\$82.50
06/02/2025	TBS	Receive, download and review certificate re notice of transfer of Walkers', Westbrand, TRC Masterfund-Gooch claim;	0.20	\$165.00	\$33.00
06/02/2025	MW	Review ECF pleading regarding Creditor Committee Compensation Request;	0.10	\$375.00	\$37.50
06/03/2025	TBS	Prepare draft answers/responses to defendants' interrogatories, request for production of documents and requests for admissions re both adversary actions; conference with Mark Western and prepare materials for use in oral argument re jury trial motion hearing;	1.80	\$165.00	\$297.00
06/03/2025	MW	Review of pleadings and preparation for Oral Argument on Jury Trial issues;	0.40	\$375.00	\$150.00
06/03/2025	MW	Further Review of discovery requests to Plaintiffs and analyze same; Prepare for and attend TEAMS conference with Patrick Finn regarding multiple issues in litigation; Email correspondences to attorney Katherine Nixon regarding discovery issues;	0.90	\$375.00	\$337.50
06/03/2025	MW	Cursory Review of multiple expert reports from Patrick Finn regarding debt/insolvency issues in other adversary proceedings;	0.20	\$375.00	\$75.00
06/04/2025	TBS	Review emails re discovery; continued preparation of draft discovery responses;	0.70	\$165.00	\$115.50
06/04/2025	MW	Review of pleadings pertinent to Jury Trial	0.90	\$375.00	\$337.50

		Hearing issue; Emails from and to attorney Nixon seeking conference; Prepare for and attend TEAMS conference with Katherine Nixon regarding tomorrow's hearing;			
06/05/2025	MW	Prepare for and attend Hearing on Jury Trial waiver via ZOOM;	1.90	\$375.00	\$712.50
06/05/2025	TBS	Receive, download and review order approving settlement-The Don, transfer of claim Argo Partners-Monica Peterson, notice of case closed 25-7012, and certificate of notice-meeting of creditors; reply of no objection re 314; reply of no objection re 286; notice re default judgment 25-7025; notice of case closed 25-7015; notice of case closed 25-7016; notice of case closed 25-7018; reply of no objection re 286;	0.50	\$165.00	\$82.50
06/05/2025	MW	Review multiple ECF pleadings/filings regarding Hearing held today;	0.20	\$375.00	\$75.00
06/06/2025	MW	Emails from and to all counsel regarding agreement for filing supplemental briefing; Review email to Judge Fisher's chambers regarding same;	0.10	\$375.00	\$37.50
06/06/2025	MW	Review ECF filings regarding Debtor's disclosure statement and objections and Hearing appearances, etc.;	0.10	\$375.00	\$37.50
06/09/2025	MW	Review multiple ECF filings regarding disclosure statement and Hearing(s);	0.10	\$375.00	\$37.50
06/09/2025	MW	Review and analyze email correspondence from attorney Singer regarding tracking or consolidating matters in terms of general issues of fact or law as compared to previous four adversary proceedings; Email correspondence to client regarding same;	0.20	\$375.00	\$75.00
06/11/2025	MW	Review of multiple ECF filings regarding Hearing on Objection to Disclosure Statement;	0.10	\$375.00	\$37.50
06/12/2025	MW	Cursory review of discovery requests propounded by Defendants in Gateway matter; Email correspondence to client regarding same;	0.30	\$375.00	\$112.50
06/16/2025	MW	Review ECF pleading regarding transfer of claim to Hain Capital Investors;	0.10	\$375.00	\$37.50
06/17/2025	MW	Email correspondence to attorney Nixon requesting discovery pleadings and preparation for TEAMS call today with client;	0.10	\$375.00	\$37.50
06/17/2025	TBS	Review and discovery link from Katherine Nixon/ CSDisco and access document production; review link/document production from Patrick Finn; conference with Mark Western;	0.90	\$165.00	\$148.50

06/17/2025	MW	Prepare for and attend TEAMS conference with Patrick Finn and attorney Nixon regarding discovery document production issues;	1.20	\$375.00	\$450.00
06/17/2025	MW	Review multiple ECF filings regarding permission for payment of professionals including the undersigned's office;	0.10	\$375.00	\$37.50
06/18/2025	MW	Review of ECF filed pleading regarding Hearing on Motion for Substantive Consolidation of Debtors' assets etc.;	0.10	\$375.00	\$37.50
06/18/2025	MW	Review email correspondence and attachments from Patrick Finn regarding Sheyenne 32 issues and Dennis Olson issues; Emails to and from Finn regarding conference call on Sheyenne 32 issues;	0.40	\$375.00	\$150.00
06/18/2025	MW	TEAMS conference with Patrick Finn regarding settlement negotiation regarding Sheyenne 32 matters;	0.50	\$375.00	\$187.50
06/19/2025	TBS	Receive, download and review lead case docket pleadings 341-379, adversary docket pleadings and update calendar re hearings and deadlines; prepare draft third application for fees;	1.50	\$165.00	\$247.50
06/19/2025	MW	Review of fee application and analyze expense issue; Authorize for ECF Filing;	0.20	\$375.00	\$75.00
06/23/2025	TBS	Final and electronically filed and serve third application for compensation; Receive, download and review Epic's Gateway brief in support of jury trial, Epic Sheyenne's brief in support of jury trial, reply of no objection to application (333), Chapter 11 monthly operating reports and exhibits A-D for all cases;	1.10	\$165.00	\$181.50
06/24/2025	TBS	Receive, download and review tenth application for compensation-Fredrikson and review docket corrections; continue to prepare plaintiffs' draft answers/responses to interrogatories, documents requests and requests for admissions (attorney Sinner); prepare draft responses to blended discovery requests from Epic Gateway LLC (attorney Gust); update calendar re briefing schedule, discovery deadlines and motion hearing;	2.50	\$165.00	\$412.50
06/24/2025	MW	Prepare Discovery and Settlement Correspondence to attorneys Singer and Gust; Telephone conference with Patrick Finn regarding contents of correspondence and substantive issues related to discovery responses; Follow up emails with all counsel regarding discovery issues and request for stay in Sheyenne 32 matter;	1.30	\$375.00	\$487.50
06/24/2025	MW	Review of ECF regarding fee application from	0.10	\$375.00	\$37.50



		Fredrickson firm;			
06/24/2025	MW	Review discovery deadlines and discovery requests pending; Instruct paralegal Smith to format written discovery responses pursuant to instructions in e-mail correspondence;	0.30	\$375.00	\$112.50
06/25/2025	TBS	Review order re disclosure statements re compliance deadlines; Receive, download and review transfer of claim-Thomas to Bradford Capital, order approving application for compensation, withdrawal of proof of claim Bradford-Thomas, amended proof of claim by Bradford, joinder of Sheyenne 32 North in Answer; joinder of Gateway in answer, tenth application of Stinson-Court, docket text associating answers;	1.60	\$165.00	\$264.00
06/25/2025	MW	Emails to and from attorney Singer regarding discovery issues and conference call; Review of ECF of transfer of claim;	0.30	\$375.00	\$112.50
06/26/2025	TBS	Review draft discovery responses (attorney Sinner's) and email Mark Western re status; review emails to/from counsel and Patrick Finn re discovery responses, revise responses to Gateway discovery requests and email Patrick Finn re same; prepare certificate of service, finalize discovery responses to Gateway and service of same;	0.90	\$165.00	\$148.50
06/26/2025	MW	Prepare for and attend phone conference with all counsel regarding discovery; Emails regarding same;	0.40	\$375.00	\$150.00
06/26/2025	MW	Review and revise Discovery Responses regarding Gateway Proceeding; Email correspondence to Patrick Finn regarding additional document provision/disclosures;	0.70	\$375.00	\$262.50

Time Keeper	Quantity	Rate	Total
Mark Western	15.7	\$375.00	\$5,887.50
Terri Smith	16.4	\$165.00	\$2,706.00
		<b>Subtotal</b>	<b>\$8,593.50</b>
		<b>Total</b>	<b>\$8,593.50</b>

## Detailed Statement of Account

### Current Invoice

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
17904	07/07/2025	\$8,593.50	\$0.00	\$8,593.50
			<b>Outstanding Balance</b>	<b>\$8,593.50</b>
			<b>Total Amount Outstanding</b>	<b>\$8,593.50</b>

Please make all amounts payable to: Fremstad Law

Payment is due upon receipt.

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NORTH DAKOTA**

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In re:

**Jointly Administered**

EPIC Companies Midwest, LLC,  
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EPIC Employee, LLC,  
EOLA Capital, LLC, and  
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Bankruptcy No. 24-30281  
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Debtors.

Chapter 11

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**NOTICE OF APPLICATION OF FREMSTAD LAW FIRM FOR ALLOWANCE OF  
FEES AND EXPENSES AS SPECIAL LITIGATION COUNSEL FOR THE DEBTORS  
FOR JUNE 2025**

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TO: The parties-in-interest as specified in the Notice and Service Requirements adopted pursuant to Local Rule 2002-1 and the Court's order limiting notice pursuant to Fed. R. Bankr. P. 2002(i). (ECF No. 124.)

1. **NOTICE IS HEREBY GIVEN** that Fremstad Law Firm, as special litigation counsel for the Debtors, has filed its first application for allowance of fees and expenses, a copy of which is attached hereto and served upon you.

2. **NOTICE IS FURTHER GIVEN** that any objection to the application must be filed with the Clerk of the United States Bankruptcy Court, whose address is Quentin N. Burdick Courthouse, 655 First Avenue North, Suite 210, Fargo, North Dakota 58102, and served upon the attorney whose name and address is listed below, by **August 6, 2025, which is twenty-one (21) days from the date of the filing of this Notice**. Any objections not filed and served are deemed waived.

Dated: July 16, 2025

/s/ Mark Western

Joel M. Fremstad (ND ID #05541)

Mark Western (ND ID# 06181)

FREMSTAD LAW FIRM

P.O. Box 3143

Fargo, North Dakota 58108-3143

Phone: (701) 478-7620

[joel@fremstadlaw.com](mailto:joel@fremstadlaw.com)

[mark@fremstadlaw.com](mailto:mark@fremstadlaw.com)

**ATTORNEYS FOR DEBTORS**